

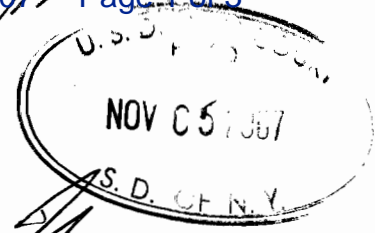
Case 1:07-cv-07391-AKH  
USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 12/6/07

Document 8

Filed 12/06/2007

Page 1 of 3

PRO SE OFFICE



Kim N. Jones,

Plaintiff,

v.

Equifax Information Services,

Defendant.

COURT FILE NO.: 07 CV 7391 (AKH)

### MOTION TO AMEND COMPLAINT

COMES NOW the Plaintiff, acting on her own behalf, hereby moves this Honorable Court to enter an order to Amend the Complaint and offers in support the following:

1. On or about September 22, 2007, Plaintiff attempted to access her credit score and sign-up for various credit monitoring services.
2. Upon making the above referenced attempt, Plaintiff was prohibited from accessing her FICO score.
3. Additionally, Plaintiff was unable to use credit monitoring services such as True Credit because errors were returned every time an attempt was made to access Plaintiff's Equifax credit file.
4. Believing that the situation was an anomaly as Plaintiff never experienced this problem prior to filing the original Complaint, Plaintiff attempted to monitor her credit file and credit score weekly.

*Motion granted,  
without prejudice to  
defender.*  
12-6-07  
*Al/K. Thel*

5. In the subsequent weeks, Plaintiff became aware that the Defendant had placed a “freeze” on her credit report, preventing external creditors, credit monitoring services, and credit scoring agencies from accessing her credit file.
6. On or about September 27, 2007, Plaintiff wrote a letter to Defendant requesting that the unrequested “freeze” be taken off of her credit file.
7. Defendant, having received the letter on October 1, 2007, ignored Plaintiff’s request to lift the unrequested “freeze” on her credit file.
8. The “freeze” on Plaintiff’s credit file impeded the Plaintiff’s ability to apply for credit, to receive new credit, and to monitor her credit score.
9. The actions of the Defendant are a violation of 15 U.S.C. § 1681b of the Fair Credit Reporting Act (FCRA) as Plaintiff’s election to apply for credit, monitor her credit file, and receive her credit score are all permissible purposes to grant access to her credit file.
10. Additionally, because the basis of the original Complaint is the accuracy of Plaintiff’s credit file and the Defendant has always maintained that the information contained in Plaintiff’s credit file was indeed accurate, the unwarranted actions by the Defendant amount to harassment.
11. Therefore, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Plaintiff wishes to amend the original Complaint to include the aforementioned violation of the FCRA as well as the acts of harassments and abuse of power inflicted by the Defendant.

**WHEREFORE**, Plaintiff respectfully requests that the Court enter an Order to Amend the Complaint in accordance with the attached Amended Complaint.

Dated: November 5, 2007

Respectfully submitted,

By: 

Kim N. Jones, Pro Se  
340 W. 85<sup>th</sup> St., #422  
New York, NY 10024  
(212) 721-7092